

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

JULIA ZIMMERMAN,

Plaintiff,

vs.

Case No: 23-cv-11634

Hon. Nancy G. Edmunds

Mag. Judge Anthony P. Patti

ELIZABETH A. PENSLE, D.O., PLLC d/b/a “PENSLE VEIN AND VASCULAR SURGICAL INSTITUTE” and “ELIZABETH FACE + BODY MED SPA”, a Michigan Professional Limited Liability Company, **ELIZABETH A. PENSLE, D.O.**, an Individual, **ELIZABETH MED SPA, PLLC**, A Michigan Professional Limited Liability Company, **DEREK L. HILL, D.O., PLLC d/b/a “HILL ORTHOPEDICS”,** a Domestic Professional Limited Liability Company, **DEREK L. HILL, D.O.**, an Individual, *Jointly and severally in their individual and official capacities,*

Defendants.

DEBORAH GORDON LAW

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PLAINTIFFS' EX-PARTE MOTION FOR LEAVE TO FILE A RESPONSE BRIEF THAT EXCEEDS THE PAGE LIMIT

Plaintiff Julia Zimmerman hereby requests leave to file a Brief in Response to Defendant's Motion for Summary Judgment, which exceeds the 25-page limit for briefs set forth in LR 7.1 (d)(3)(A).

Plaintiff seeks to file a brief that is 37 pages in length. Plaintiff has made a good faith effort to reduce the length of her Brief without sacrificing clarity, and while still adequately addressing the complex issues presented in this case and the instant dispute.

For these reasons, Plaintiff respectfully request that this Honorable Court grant their Motion for Leave to File a Response Brief that Exceeds the Page Limit.

Dated: May 16, 2025

DEBORAH GORDON LAW

/s/Deborah L. Gordon (P27058)

Attorney for Plaintiff

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CERTIFICATE OF SERVICE

I hereby certify that on May 16, 2025, I electronically filed the foregoing document with the Clerk of the Court using the ECF system, which will send notification of such filing and service of said documents to all parties through their counsel of record.

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/s/Deborah L. Gordon (P27058)

Attorney for Plaintiff

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**PLAINTIFF'S BRIEF IN SUPPORT OF HER EX-PARTE MOTION FOR
LEAVE TO FILE A RESPONSE BRIEF THAT EXCEEDS THE PAGE
LIMIT**

Plaintiff Julia Zimmerman hereby requests leave to file a Brief in Response to Defendant's Motion for Summary Judgment, which exceeds the 25-page limit for briefs set forth in LR 7.1 (d)(3)(A). Plaintiff seeks to file a brief that is 37 pages in length.

Relying on the facts and law set forth in the above motion, Plaintiff respectfully requests that this Honorable Court grant her Motion for Leave to File a Response Brief that Exceeds the Page Limit.

Dated: May 16, 2025

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